UNITED STATES DISTRICT COURT DISTRICT OF SOUTH CAROLINA CHARLESTON DIVISION

Vickie Stokes, Rodney Barnett, and Michael Barnett, as the Personal Representatives of the Estate of John M. Barnett,) Case No. 2:25-cv-02110-BHH)
Plaintiffs,) CONSENT MOTION FOR) EXTENSION TO RESPOND TO
Versus) PLAINTIFFS' COMPLAINT
The Boeing Company,))
Defendant.))

Pursuant to Local Civil Rules 6.01 and 12.01, Defendant The Boeing Company ("Defendant") submits this Consent Motion for an Extension of Time to Respond to Plaintiffs' Complaint and serve Local Rule 26.01 disclosures by an additional thirty (30) days to Friday, May 16, 2025.

Defendant was served with Plaintiffs' Summons and Complaint on March 26, 2025. Pursuant to Rule 12(a)(1)(A)(i) of the Federal Rules of Civil Procedure, Defendant's current deadline to answer or otherwise respond to Plaintiffs' Complaint is currently April 16, 2025.

Defendant has determined that additional time is needed to complete its preliminary investigation into the allegations of Plaintiffs' Complaint and to prepare an appropriate response to the same. Defendant has requested, and Plaintiffs have agreed to, an extension of Defendant's deadline to answer or otherwise respond to Plaintiffs' Complaint and serve Local Rule 26.01 disclosures by thirty (30) days, such that the new deadline would be Friday, May 16, 2025.

Defendant submits this Consent Motion for Extension without any admission of any factual allegation of legal conclusion and without waiver of any right, defense, affirmative defense, or objection, including the defenses which may be raised under Rule 12(b) of the Federal Rules of Civil Procedure for lack of personal jurisdiction, insufficient process, insufficient service of process, and failure to state a claim.

This deadline has not been previously extended. The requested extension would not affect other deadlines as no other deadlines, to Defendant's knowledge, exist at this time. Therefore, Defendant respectfully request that the Court extend Defendant's deadline to answer or otherwise respond to Plaintiffs' Complaint and serve Local Rule 26.01 disclosures by an additional thirty (30) days, such that the new deadline would be Friday, May 16, 2025.

Submitted this 10th day of April 2025.

WE SO MOVE:

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WE SO CONSENT:

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